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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In) **Case Number: 2010-23251**
DENNIS JENSEN) **Docket Control No. PR-1**
)
) **NOTICE OF MOTION BY DEBTOR**
) **FOR ORDER OF ABANDONMENT OF**
) **DEBTOR'S BUSINESS**
)
) **[11 USCS SECTION 554(b),**
) **BANKRUPTCY RULE 6007(b)]**
)
)
Debtor) **Date: March 16, 2010**
) **Time: 9:30 a.m.**
) **Place: Department C/Courtroom 35**

COMES NOW, debtor, DENNIS JENSEN, who move the above-entitled Court for an
Abandonment of Debtor's Business known as Jensen Media.

1. DENNIS JENSEN is the debtor in the above-named Chapter 7 case.
2. Debtor is the owner of a business known as Jensen Media, located at 7822 Edendale
Court, Elk Grove, California 95758 with a mailing address of Post Office Box 3047, San Rafael,
California 94912.
3. Debtor, in Schedule B has listed the value of the business at \$1.00, and the value
of his tools of trade at \$6,330.00; all of which has been claimed exempt in the Debtor's Schedule

1 C.

2 4. Debtor does not have any employees, nor does he have a lease on the premises.
3 Debtor performs audio and visual work for television stations. When Debtor is contacted by a
4 television station he provides the audio and visual services for short segments that appear on news
5 broadcasts throughout Northern California.

6 5. As of the date of this Motion, the duly appointed Trustee, Susan Kaufman Smith,
7 has not administered such business or the property of such business.

8 6. Debtors assert that the business known as Jensen Media is therefore of
9 inconsequential value to the estate in that there is no equity in such property in excess of the
10 Debtor's exemptions.

11 7. Debtor asserts that the obtaining of an Order of Abandonment is in his best
12 interests as it will allow the debtor to protect the business and the property of the business.

13 WHEREFORE, Debtor request the following relief:

14 1. An Order of Abandonment of Debtor's interest in the business known as
15 Jensen Media;

16 2. Such other and further relief as the Court deems just and proper.

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19 Dated: February 18, 2010

/s/
PATRICK RIAZI
Attorney for Debtor